

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SCOTT BLAIR,

*Plaintiff,*

v.

ALSTOM TRANSPORTATION, INC.  
AND KAWASAKI RAIL CAR, INC.,

*Defendants.*

CA No. 1:16-cv-03391-PAE-JLC

**DECLARATION OF OSAMU KOYAMA**

I, Osamu KOYAMA, declare as follows:

1. I am Controller at defendant Kawasaki Rail Car, Inc. ("Kawasaki"). I submit this declaration in support of Kawasaki's Motion for Judgment on the Pleadings, a Finding of Exceptional Case, and Attorneys' Fees and Costs Pursuant to 35 U.S.C. § 285 and Fed. R. Civ. P. 54(d).
2. In April 2017, at Kawasaki's request, Kawasaki's ultimate corporate parent (Kawasaki Heavy Industries, Ltd. ("KHI")) retained FRONTEO, Inc. ("FRONTEO"), a litigation discovery vendor, to assist Kawasaki with its document production obligations for this case.
3. Attached as Exhibit A is a true and correct copy of an invoice that KHI received from FRONTEO for goods and services rendered in June 2017 in connection with Kawasaki's document production in this case. KHI has paid this invoice in full on Kawasaki's account.
4. Attached as Exhibit B is a true and correct copy of an invoice that KHI received from FRONTEO for goods and services rendered in July 2017 in connection with Kawasaki's document production in this case. KHI has paid this invoice in full on Kawasaki's account.

I make this Declaration under penalty of perjury that the foregoing is true and correct.

Executed on: December 9, 2019

By:

A handwritten signature in blue ink, appearing to read 'Osamu Koyama', is written over a horizontal line. The signature is fluid and cursive.

Osamu KOYAMA

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2019, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/Sheila Mortazavi  
Sheila Mortazavi